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FRANK R. ELLERBE, III

DIRECT 803 227.1112 DIRECT FAX 803 744.1556

fellerbe@robinsongray.com

April 22, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Public Service Commission Review of South Carolina Code of Regulations
Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)
Docket No. 2020-247-A

Dear Ms. Boyd:

This letter is in response to the Commission's Revised Notice of Follow-Up Workshop regarding Notices in Customer Bill Inserts filed April 5, 2022. Blue Granite Water Company ("BGWC") will participate in the workshop on April 29, 2022.

BGWC appreciates the opportunity to provide comments on this matter. BGWC believes that keeping customers informed is essential to the regulatory process. Like other parties in this docket, BGWC appreciates and encourages the Commission's efforts to streamline the notices for these proceedings.

Concerning the method of delivery – bill inserts or direct mail – for mailed notices, BGWC believes there are benefits and drawbacks to both methods and that either method may be appropriate depending on the circumstances. Typically, bill insert notices are much cheaper, but require a full billing cycle (approximately one month) to be fully distributed. Directly mailing notices provides faster competition of the notice, but costs more due to additional postage and supplies. There are times when the advantages of either method outweigh the drawbacks of the other, therefore BGWC believes both should be available to use.

BGWC agrees that keeping notices to a two-page length is most effective considering the impacts on customer engagement, customer understanding, and efficiency for utilities. Increasing the font size from 10 point to 12 point adds approximately 20% to the size of a document, which means utilities will either have longer notices at higher costs, or less information to maintain current notice lengths.



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Using color can enhance the effectiveness of a notice. For BGWC a color print notice adds about 10% to the supplies and processing costs of the notice. BGWC currently issues approximately 22,500 bills each month. At current supplies and processing rates the cost of 22,500 notices, per page of length, is \$1,490 for black and white, and \$1,633 for color print. Our postage costs vary, but at our average postage and supplies rates, the cost of directly mailing 22,500 notices is \$9,666.

BGWC hopes the Commission finds this input helpful in the decision-making process of this docket, and we look forward to participating in the second follow-up workshop on Friday, April 29, 2022.

Yours truly,

Frank R. Ellerbe, III

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cc: Parties of Record (via e-mail)